

JS 44 (Rev. 06/17)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Gordon Roy Parker

(b) County of Residence of First Listed Plaintiff Philadelphia
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Pro Se

DEFENDANTS

Brian R. Zaiger, E-Drama Ltd., EncyclopediaDramatica.rs,
EncyclopediaDramatica.se and Does 1-10, individual editors/owners
of the company.

County of Residence of First Listed Defendant Essex
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party) **WO**
- ☐ 2 U.S. Government Defendant
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | PTF | DEF | PTF | DEF |
|---------------------------------------|---------------------------------------|----------------------------|----------------------------|
| <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| <input type="checkbox"/> 2 | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |
- Citizen of This State
- Citizen of Another State
- Citizen or Subject of a Foreign Country
- Incorporated or Principal Place of Business In This State
- Incorporated and Principal Place of Business In Another State
- Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 USC 3601

Brief description of cause:

Libel with diversity jurisdiction, federal question of 47 usc 230

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$
300,000,000.00

CHECK YES only if demanded in complaint:
JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE June 13, 2017

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

UNITED STATES DISTRICT COURT

17 2675

PBT
 FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 4247 Locust Street, Philadelphia, PA 19104

Address of Defendant: 116 Lafayette Street (The Lafayette Hotel), Room #111, Salem, MA 01970

Place of Accident, Incident or Transaction: 4247 Locust Street, Philadelphia, PA

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?
 (Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a)) Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: Judge Date Terminated:

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases
 (Please specify) Libel (47 USC 230)

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☒ All other Diversity Cases
 (Please specify) Libel (47 USC 230)

ARBITRATION CERTIFICATION

(Check Appropriate Category)

1. _____, counsel of record do hereby certify:
☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
☐ Relief other than monetary damages is sought.

DATE: June 13, 2017

Attorney-at-Law

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE:

Attorney-at-Law

Attorney I.D.#

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

Gordon Roy Parker

v.

Brian R. Zaiger, et al

CIVIL ACTION

NO. **17 2675**

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

June 13, 2017	Gordon Roy Parker	Pro Se
Date	Attorney-at-law	Attorney for
215-921-4592		GordonRoyParker@aol.com
Telephone	FAX Number	E-Mail Address

GORDON ROY PARKER, a/k/a "Ray Gordon,"
4247 Locust Street, #119, Philadelphia, PA 19104

V.

BRIAN R. ZAIGER, a resident of Massachusetts,
E-Drama, Ltd., a foreign business entity,
ENCYCLOPEDIADRAMATICA.RS, a website,
ENCYCLOPEDIADRAMATICA.SE, a website,
 and Does 1-10, individual editors/owners of the
 website,

Defendants

Case No: **17 2675**

**: Complaint for Libel,
: Invasion of Privacy,
: Tortious Interference,
: Intentional Infliction of
: Emotional Distress, Civil
: Conspiracy, and Violations
: of the Fair Housing Act, for
: Legal Change Of Name, and
: for Declaratory Relief**

Plaintiff Gordon Roy Parker, in the above-styled action, sets forth the following:

1. Plaintiff **Gordon Roy Parker**, a/k/a "**Ray Gordon**," is an adult male domiciled and residing in the Commonwealth of Pennsylvania.

2. Defendant **Brian R. Zaiger** is an adult male, domiciled and residing in the Commonwealth of Massachusetts, whose last known address is 116 Lafayette Street (The Lafayette Hotel), Room #111, Salem, MA 01970.¹

3. Defendant **E-drama, Ltd.**, is a foreign business entity which claims to own the websites in controversy in this action (see below).

4. Defendants **Encyclopediadramatica.se** and **Encyclopediadramatica.se** are successive versions of a website known as “Encyclopedia Dramatica.” (“The ED website” or

¹ In the case of Monsarrat v. Gotper6067-00001 et al., D.Mass #17-cv-10356, Mr. Zaiger was identified (in the service affidavit of Richard Goren, attached hereto as Exhibit A and incorporated by reference as if set forth verbatim herein) as the self-reported owner of Defendant Encyclopediadramatica.se in that case, the same publisher as Defendant Encyclopediadramatica.rs in this case. In that case, the Does were served alternatively by e-mail.

“ED”). They may be served either through Mr. Zaiger, or by e-mail at advertising@encyclopediadrmatca.rs.²

5. Does 1-10 are as-yet-unnamed parties who are either administrators for the ED website, any outside contributors to the page concerning Plaintiff in controversy in this lawsuit (“the ED page” located at https://encyclopediadrmatca.rs/Ray_Gordon).³

NATURE OF ACTION

6. An association-in-fact RICO enterprise that calls itself the *Super Extreme Twitter Gang* (#setg), is led by a small group of lawyers, aided by hackers and other cybergoons, who profit by targeting litigious individuals for defamation, finding otherwise-innocent, third-party *pawns* who have an existing grudge against their target, link those pawns to defamatory content about the target, such as that which appears on the ED website about Plaintiff, wait for the pawns to make the libel their own, and profit from the inevitable litigation which results.

7. The #setg scheme has netted millions of dollars in legal fees, while simultaneously costing the government six figures already, well on the way to a seven-figure public tab if #setg is not enjoined; to that extent, this lawsuit is brought to serve the public interest, since Plaintiff is already “on the dole,” thanks solely to the efforts of #setg. Numerous lawsuits brought by Plaintiff were the direct result of a pawn grabbing the “bait” that is the ED website in order to explore and confirm an existing dislike of Plaintiff, and then finding themselves sued because of their “internet friends” having manipulated them.⁴

² Plaintiff e-mailed a Cease And Desist letter, attached hereto as Exhibit B and incorporated by reference as if set forth verbatim herein, to both contact@encyclopediadrmatca.rs (similar to the address on the “se” domain that was served for the Does in *Monsarrat*), and to advertising@encyclopediadrmatca.rs, a mail listed on the site to solicit potential advertisers, due to ED’s donations “drying up” according to the site.

³ A copy of the ED page as it appeared on May 10, 2017 is attached hereto as Exhibit C and incorporated by reference as if set forth verbatim herein.

⁴ In the end, we are responsible for our actions, but these pawns certainly had enough help from #setg, which is why Plaintiff has not named the pawns as co-conspirators, and is suing Defendants rather than the latest group of pawns. Plaintiff also minimizes his contact with the outside world so as not to allow others to be harmed by #setg, or their

JURIDICTION AND VENUE

8. This court has subject-matter jurisdiction over all Defendants under 28 USC §1331, due to the existence of multiple federal questions (47 USC §230, IIED, Fair Housing, and the constitutional right to change his legal name), and diversity jurisdiction under 28 USC §1332.

9. This court has personal jurisdiction over the Defendants because a) their conduct was expressly targeted at Pennsylvania residents, including Plaintiff, and designed to cause him harm in Pennsylvania; b) they have conspired and/or contracted with individuals who are subject to Pennsylvania jurisdiction; c) their misappropriation of Plaintiff's likeness occurred in Pennsylvania; and d) Pennsylvania has long-arm jurisdiction over all Defendants, who would not be prejudiced relative to Plaintiff if this action were heard in Pennsylvania.⁵

BACKGROUND

10. Plaintiff realleges, as if verbatim, all averments from all previous paragraphs.

11. In December, 2011, Plaintiff became aware of the ED website, when he found a link to http://www.encyclopediadramatica.se/Ray_Gordon ("the ED page," which has been moved to an .rs domain with the same URL) on someone's social-media page. The person who linked to the site was immune from suit under 47 USC §230, and the social-media site refused to remove the link. Instead, Plaintiff contacted the ED website directly, hoping to have the page removed.

12. In a protracted series of e-mails, the ED admin, now believed to be Defendant Zaiger, not only refused to remove the page, or Plaintiff's image, but added his own content to the page, including an imputation of pedophilia upon Plaintiff, a claim on the page that Plaintiff had

ignorance about same. Anytime Plaintiff looks for employment, housing, or even new friends, he risks being targeted by misguided vigilantes who themselves are targeted by #setg to generate white-collar fees.

⁵ As Boston is about an eight-hour train ride from Philadelphia, this case could be refiled in Massachusetts, but at extreme inconvenience to Plaintiff. Prior to discovery in Monsarrat, he had no idea where to sue ED, who owned it, and had no reason to believe they were even in the United States. Defendants have taken extraordinary measures to conceal their identity.

authored “an essay about killing and torturing young gymnasts,” and a Google link to a USENET posting written by an imposter, who signed Plaintiff’s name (from an ISP never used by Plaintiff), in retaliation for Plaintiff having publicized a massive child-abuse scandal in elite gymnastics, one which continues to make news in the present, with new allegations about that sordid time in our history.⁶

13. On the morning of December 23, 2011, Defendant Zaiger, or someone under his direction and supervision, made multiple e-mail threats to Plaintiff:⁷

a. In response to a threat to sue over infringement and the misuse of Plaintiff’s photo, the first e-mail explained why ED could not be found to be sued. This was debunked by the Goren Affidavit (Exhibit A), which proved that Defendant Zaiger and ED have been on American soil all along. Here are the lies in the first e-mail:

“We don’t need to answer any international suit. In fact, our owner can’t even enter the US because he would be detained upon arrival...our public-facing servers are \$10 cloud servers that reverse proxy to our real, *hidden infrastructure*, which you have no idea of the location...please sue us. We are really sick of people telling us they will and then no fun happening. (Exhibit D, Mail #1)

b. In the second mail (Mail #2 of Exhibit D), ED admitted ties to Anonymous:

“...not even aware of ED’s connection to *LulzSec*, and the fact that ed.ch is a product of #OPsaveED from Anonymous.”

c. Mail #3 from Exhibit D was much more direct, and resulted in the ED editor(s) adding Plaintiff’s home address to the ED page, removing it only after the January 9, 2014 incident with Adam Steinbaugh of TheFIRE.org that is detailed in paragraph 16:

“How is Locust Street? By the way, that IP is yours. It’s all being added to your article. Keep talking to the microphone.”

⁶ This imposter, David Clanton, also of Massachusetts, had once threatened to kill Plaintiff and his mother, and also impersonated the latter on a sex newsgroup with an invitation to men to call or visit (with contact information). Despite this, the ED page has perpetuated the lie originated by Clanton in 1997. One individual who republished the allegations prior to ED, Derek Trunk, is currently serving seventy-five months in federal prison for trafficking in child pornography.

⁷ Those e-mails are attached as Exhibit D and incorporated by reference as if set forth verbatim.

d. Mail #4 was the threat which chilled Plaintiff's speech, as it created a genuine fear of collateral damage which finally materialized in 2016:

"I think *we will post some of your fanfic to your neighbors*. A few hundred copies per house should be fine. It's also against the law to write stories involving underage girls. Welcome to the sex offender registry."⁸

14. At the time these e-mails were sent, Plaintiff's brother Walter was working the front desk at the Fairfax, which immediately put his job (and Plaintiff's housing) in peril. As detailed in Parker v. 4247FX, Inc., Plaintiff had been forced to be "on call" to cover Desk situations when Walt was sleeping or absent. This harassment ultimately cost Walt his job due to ED-incited death threats which made the Fairfax unsafe; Walt has since moved out. By mentioning Walt periodically, ED was "reminding" Plaintiff of this leverage, which it used to silence him online.

15. Subsequent events have shown that these were anything but empty threats. Almost immediately, anywhere Plaintiff went, no matter where he posted, or chatted on social media, within a short period of time, a small group of individuals would follow him, inject themselves into his interaction, link to the ED page, and then let nature take its course. Depending on the pawn, Plaintiff would wind up ostracized, ignored, defamed, harassed, threatened, or even *cyberstalked*.⁹ Serious federal crimes have been and continue to be committed by #setg.

Defamation, Harassment, And Legal Threats
From Ken "Popehat" White And Adam Steinbaugh (TheFIRE.org)

16. On January 8, 2014, Plaintiff got into an argument on Twitter with @rsmccain, a woman named Rachel McClain in Washington, DC, over gender discrimination and sexualized

⁸ Particularly noteworthy here is the tie between Adam Steinbaugh and TheFIRE.org to Anonymous, which was established when Charlotte Laws, mother of a "revenge porn" victim, said she used (and welcomed) the assistance of Anonymous in tracking down the operators of the revenge-porn sites, for which she credited Steinbaugh.

⁹ This culminated in a credible threat to Plaintiff's life on February 29, 2016, which cost Plaintiff's brother his job, both of them their apartment, and which has necessitated that they live separate lives, at great cost to Plaintiff. It has also resulted in tremendous legal fees for Plaintiff's landlord's counsel, a firm who has represented other pawns, and a tremendous cost to the government, in disability benefits, medical care, and other expenses all attributable to #setg.

hiring. Unknown to Plaintiff at the time, Ms. McCain conversed about Plaintiff with Kenneth “Popehat” White, a practicing lawyer in California, blogger, and purported “free speech advocate.”¹⁰ Mr. White tweeted the following concerning Plaintiff:



17. The next day, January 9, 2014, during an argument about “revenge porn,” attorney Adam Steinbaugh, then a law-school graduate, posted a link to the ED page concerning Plaintiff. Within moments, and continuing for several hours, Plaintiff was repeatedly threatened by misguided vigilantes that the ~~#seig~~ uses as pawns, all of whom formed a group which circled around Steinbaugh and the “anti-revenge porn” movement.¹¹ Following is one such tweet, which included the unauthorized use of Plaintiff’s likeness, and a direct reference to ED:



¹⁰ At the time of these tweets, Plaintiff had no idea who Steinbaugh and “Popehat” were and had no reason to look for these tweets. He was made aware of them on June 4, 2017, when the ED Twitter account linked to them.

¹¹ Plaintiff, as the author of dating-advice books which became part of the “PUA community,” was a natural adversary of feminists, in addition to his having filed discrimination suits and having spoken out against sexualized hiring in the workplace, and his perception of feminist hypocrisy on this issue.

18. In response to Plaintiff threatening to file suit against Steinbaugh and some of his friends (including several attorneys, like Sarah Jeong), Mr. Steinbaugh sent the following e-mail:

Regarding various legal threats

From: Adam Steinbaugh <adam.steinbaugh@gmail.com>

To: bettoroffsingle <bettoroffsingle@aol.com>

Date: Thu, Jan 9, 2014 1:31 pm

Mr. Parker:

This will be my only attempt to email you. I am uninterested in a lengthy dialogue (or monologue).

You've made numerous, implied threats of taking legal action against me (and many others) over mentioning or linking to this hyperbolic Encyclopedia Dramatica page: http://encycopediadramatica.es/Ray_Gordon and/or for excerpting a frame from one of your lengthy YouTube videos.

I am considering my legal options.

- 1) Do you intend to file a lawsuit?
- 2) Who do you intend to name as a defendant in such a lawsuit, if any?
- 3) In which court do you intend to file suit?
- 4) On what basis or bases do you intend to sue?

4) On what basis or bases do you intend to sue?

If you do not intend to sue me, cease and desist threatening as much. If your conduct continues, I will happily consider seeking declaratory relief.

If you intend to sue others (or myself) on a theory that they can be liable for the writings of others on a website they have no control over, I will be more than happy to write about it, as censorious lawsuits are my niche.

Regards,

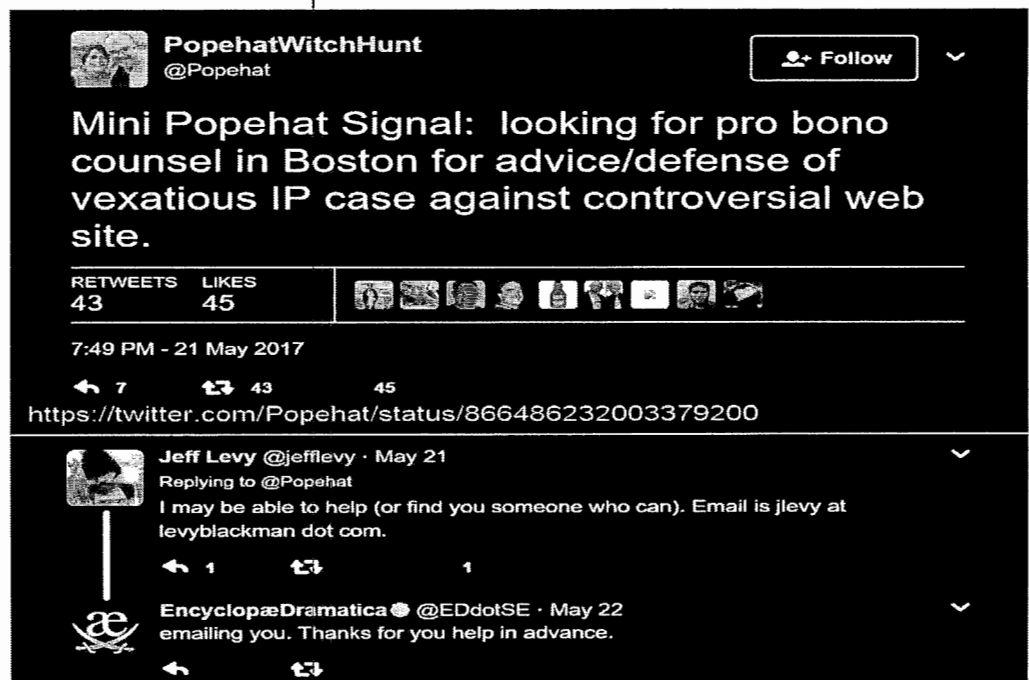
Adam Steinbaugh

adam.steinbaugh@gmail.com

19. As noted above, Mr. Steinbaugh's e-mail combines a threat of a declaratory lawsuit with a threat to "write about" my legal threats, and in the course of doing so, to continue linking to the ED website. Though not an attorney at the time, Mr. Steinbaugh had his JD and was preparing to take the California Bar Exam, while clerking for SJS Counsel, APC, run by Samuel J. Smith, a California attorney who had taken a high-profile defamation case. Mr. Steinbaugh has also admitted many times, in the name of his blogging activities, to scan PACER for lawsuits filed by pro se litigants, most of which he ridicules. Mr. Steinbaugh, in 2014 and through the present, has also been a contributor to popehat.com, the blog run by White, a partner at Brown,

White & Osborn, LLP. Another regular contributor to the Popehat blog is Marc J. “Marco” Randazza, defense counsel in *Monsarrat*.

20. Ken White endorses one side of a lawsuit, he sends out a “Pope Signal,” an internet call for pro bono or other referred counsel, in the name of activism, though he will also take some cases himself. Such a signal was sent out on behalf of Defendant ED in *Monsarrat*, with Defendant ED thanking *Popehat* “in advance” for his assistance.



21. As a direct and proximate result of Adam Steinbaugh’s conduct on January 9, 2014, Plaintiff suffered extreme emotional distress, and was in fact told by someone in *#setg* that the goal was *Googlecide*, or to use Google results to induce him to end his life (which would, of course, generate posthumous litigation). Instead, Plaintiff withdrew from Twitter and the internet in general, due to *#setg*, with ED and Google as their weapons, putting a perpetual target on Plaintiff’s back in order to profit from anyone foolish enough to be goaded into taking aim. ED’s Twitter account is even *Verified*, giving it the appearance of legitimacy, to some.

SWATTING (December 2015)

22. While Section 230 claims to promote free speech, its existence has had the opposite effect on Plaintiff, due to the law's enabling of the *#setg* scheme, leaving Plaintiff defenseless against defamation from those using its immunity as a sword rather than as a shield.

23. In early December, 2015, Plaintiff returned to Twitter, only to be ganged up on again by *#setg*, led by an anonymous Twitter user known as "Grock," who has had various identities, the one at this time being *@Knight_M0ves*, an apparent reference to the hacker group "Knight Sec." "Grock" claims to be an IT professional, and communicates extensively with attorneys online. Florida attorney Kim Picazio (who many, including Plaintiff, suspect is "Grock") claims to have met and hired this individual, who in turn has taken a strong interest in her cases. "Grock" is also connected to Adam Steinbaugh and Popehat through *@That_AC*, a user known as "That Anonymous Coward," who claims to be a gay male, yet refers to Adam Steinbaugh as "his" "boo." Steinbaugh's girlfriend is Sarah E. McLaughlin, of *TheFIRE.org*, and she is who Plaintiff, based on the foregoing, believes to be *@That_AC*.

24. On or around December 3, 2015, Plaintiff was being ganged up on by *#setg*, when he was warned that the police would be visiting his apartment "very soon." Moments later, Plaintiff was informed that someone had dialed 911 in Philadelphia from an anonymous internet phone line, and reported that Plaintiff was unconscious from a drug overdose that constituted a suicide attempt. The ED twitter name bragged about the incident, even threatening to post a recording of the 911 call (indicating they are likely behind this "Swatting" of Plaintiff).

25. In the days following the SWATting, Plaintiff received numerous death threats from various *#setg* Twitter accounts, including some from people who claimed to be literally about to

shoot him in his home. Secondary to these threats, Plaintiff began fearing for his life, and once again retreated from social media, particularly Twitter, due to the “target on his back.”

Threats To Plaintiff’s Life (February 29, 2016)

26. On or around Saturday, February 27, 2016, the user **@knight_m0ves** (“Grock”) posted an inciteful tweet in which s/he imputed mental illness upon Plaintiff by name. One of Grock’s followers, **@MichelleLMckee**, one Michelle L. McKee of Gig Harbor, WA, read the tweet.

27. On Monday, February 29, 2016, **@TVG** host Todd Shrupp retweeted a tweet by Plaintiff towards one of its hosts, calling it a “Mean Tweet.” This was viewed by Shrupp’s thousands of followers, many of whom immediately chimed in to deride Plaintiff, with one such follower – using a now-suspended account – making repeated threats to kill Plaintiff, noting he was “two hours away” and “on his way to [Philadelphia]” to “smash [Plaintiff’s] head open.”¹²

28. The individual who had threatened Plaintiff did so after finding the ED page, to which he was fed a link by Michelle L. McKee, after putting out a call for “information” concerning Plaintiff. Ms. McKee, who had **#setg** in her profile, was part of that group, which included Grock, attorney Kim Picazio (also suspected of being “Grock”), and a number of other individuals who had replied to or retweeted Steinbaugh’s link to ED in 2014, including but not limited to Twitter users **@truthseeker_11** (believed to be filmmaker Marie Pusateri), and **@Arch_Angel**, among others. McKee was following Grock/Picazio’s lead in inciting the threats, possibly to drum up business for Picazio if/when Plaintiff sued McKee or others. “Grock” has routinely offered lawyer referrals to people threatened with suit, by Plaintiff or others.

¹² This is the death threat which gave rise to Parker v. FX 4247, Inc., and which indirectly cost Plaintiff’s brother his job at the front desk of the Fairfax, led to his brother moving out, and Plaintiff barely interacting with his brother, let alone living with him, all due to safety concerns. The threats also rendered moot any retaliation concerns Plaintiff and his brother had, resulting in the wage complaints that would not have been filed absent this threat (out of fear of retaliation) and its consequences.

29. On or around 1:30 am on March 1, 2016, Plaintiff ascertained the source of the Twitter threat, with further investigation revealing that, while credible, the threat was not imminent, though once again he had to withdraw from social media, using only pseudonyms when on Twitter, and unable to communicate as himself, or to promote his work.

30. After this series of threats, again the result of links to the ED page, Plaintiff once again withdrew from social media, while dealing with the situation that led to Parker v. 4247FX, Inc., E.D.Pa. 16-cv-2710. Last November, his brother moved out, leaving Plaintiff alone to deal with his disabilities, and an apartment in which he never intended to live alone, and in which he lived solely because of a situation which no longer existed, all thanks to *#setg*.

Law Offices Of Faye Riva Cohen, P.C.

31. In or around the Spring of 2016, Plaintiff was seeking an attorney for what would become Parker v. 4247FX, Inc.. He was not impressed with the above-referenced lawfirm, and posted a negative comment on their Facebook page (which, of course, they could delete). In response, Ms. Cohen's office replied with a link to the ED page, which it then deleted after Plaintiff explained that they had just fallen into a "trap" set by *#setg*. The ED page is also one of the reasons Plaintiff has had difficulty securing counsel.

Olivia Ann Cara (September 2016)

32. YouTube "celebrity" Olivia Ann Cara has 400,000+ subscribers. In September, 2016, Plaintiff stumbled across her channel, out of curiosity related to his having seen her older sister Brianna sing years ago online. Unknown to Plaintiff, the Cara sisters had been stalked years ago by some obsessed fan who sent them threatening tweets and unsolicited gifts. Apparently, their mother, Beverly Fogelman Cara, speculated that "Ray" (the name under which Plaintiff is known) might have been "Tommy," who was the actual stalker. This "Tommy" began sending

messages to Olivia again in early 2016, and in April 2016, Ms. Cara made a video speculating that Plaintiff may have been Tommy, noting that he had “said mean things” about Brianna’s former group years ago.

33. When Plaintiff e-mailed Ms. Cara to inform her of her mistake, she “doubled down,” making another video entitled *Publicly Addressing My Stalker*, in which she cited behavior which did not constitute stalking, and which was not illegal in any way. In the comments section of this video, someone inevitably linked to the ED page about Plaintiff:



Breanna Walker 5 days ago

Not trying to cause drama. Just thought it would be wise to share this so young women can be aware and be careful of who they interact with.

https://encyclopediadramatica.se/Ray_Gordon

Reply • 35

34. Olivia then fell right into the trap set by *#setg*, by making the words her own in a comment to her fans, many of whom harassed Plaintiff on his own YouTube channel (his rebuttal video had over 2,400 dislikes before Plaintiff took it down):



mememeome 1 hour ago

If you didn't want people to harass him, why would you put him on blast and completely expose him? You could've spoken to him personally if that was not your goal

Reply •



Olivia Cara 34 minutes ago

I don't want to stoop to his level. But i'm also not trying to protect a man who literally writes fan fiction about raping, torturing, and killing gymnasts???

Reply • 9

35. Section 230 does not protect Ms. Cara’s statement above, and Plaintiff could just as easily have filed suit against her (and still can), as well as against many others who have fallen victim to *#setg* setting them up to be sued, but the very lawyers who are behind *#setg*, or who profit from it, would then claim that Plaintiff is being vexatious, as if he is just supposed to let his reputation be destroyed by instigators who use Section 230 as a sword rather than a shield.

Chess.com And Elijah Logozar (June 11, 2017)

36. Plaintiff has returned to training at chess, as a way of passing time in isolation, and is planning to return to chess tournaments. His recent experience on chess.com (where his username is “StupidGM” and his identity is known to the members there) shows how even “gifted” people fall into the *#setg* trap:



37. Elijah Logozar is *fifteen* years old, from Austin, TX, and was linked to the ED page by “IM Phren,” who lives in Greece. In this case, were he sued for this or other defamation (once he made the words his own), his *parents* would be liable for what he says, while the instigator (*#setg*) laughs all the way to the bank, including laughing at the “puppet” judiciary.

38. What seem like relatively few incidents actually comprise a large percentage of Plaintiff’s online interactions, while he has all but become an agoraphobic recluse due to the very real threat of *#setg*-incited vigilantes, and *#setg*-instigated legal action. Plaintiff is far from the only “pawn” of these lawyers, who have similarly set up other individuals and corporations.

Direct Libel By Defendants

39. In addition to the e-mailed threats of defamation in 2011, including “flyering” Plaintiff in his neighborhood, the official, *verified* ED twitter account (either run or controlled by Defendant Zaiger) posted the following statements concerning Plaintiff and his disability:



<https://twitter.com/EDdotSE/status/871469678287351809>

40. Once again, Defendants made the words (which were accompanied by threats to call the SSA) from the ED page their own, by imputing Social Security fraud upon Plaintiff, while their own website is the primary reason he wound up on disability in the first place, since Plaintiff has been disabled since childhood, but earned too much to qualify until he wound up blacklisted, first for whistleblowing against Philadelphia law firms, and then secondary to people finding the ED page, the content of which has been introduced by opposing counsel in previous cases (when it appeared on other websites).

COUNT ZERO: RICO VIOLATIONS

41. Plaintiff realleges, as if verbatim, all averments from all previous paragraphs.

42. Plaintiff will not seek relief under RICO without counsel, which he is in the process of attempting to secure. Absent counsel, this claim will not be added to any Amended Complaint. Here, he will outline the RICO conspiracy by “casting” *The Sopranos* as if the RICO were the show (the predicate acts include witness intimidation and Sarbanes-Oxley violations, plus Hobbs Act Extortion and Wire Fraud):

- a. TheFIRE.org is the RICO enterprise (18 USC 1962b).
- b. “Tony Soprano” is former federal prosecutor Ken “Popehat” White.
- c. “Silvio Dante” is Adam Steinbaugh

- d. “Christopher Moltisanti” is Kim Picazio a/k/a “Grock.”¹³
- e. “Paulie Walnuts” is Defendant Zaiger

COUNT ONE: LIBEL (All Defendants)

43. Plaintiff realleges, as if verbatim, all averments from all previous paragraphs.

44. As Exhibit C shows, the ED page (which includes Plaintiff’s birth name, and as of January 9, 2014, also included his home address, but that was removed, apparently on Steinbaugh’s direction) contains the following statements concerning Plaintiff:

- a. The “On USENET” section says that Plaintiff “posts fanfic that revolves around himself torturing, raping, and killing young gymnasts,” with a link to the purported essay.¹⁴
- b. The “On Twitter” section was updated in January 2017, and contains the claim that Plaintiff was “harassing women,” when in fact Plaintiff was being targeted by feminists, including those who had either threatened him, or linked to ED themselves.
- c. The “On Encyclopedia Dramatica” section references the 2011 incident in which an ED editor (Defendant Zaiger or someone under his direction) began editing the page, including adding a link to the essay referenced in subparagraph (a) above.

¹³ Ms. Picazio represented Crystal Sheffield, the mother of missing child Haleigh Cummings. While Plaintiff cannot place her at the scene of that crime, Kim’s ex-husband is convicted felon Michael Picazio. In June, 2016, Mr. Picazio made a thinly-veiled threat to hunt down Deric Lostutter (now convicted of a hacking crime for which Picazio and a number of her loyalists appear to have been accomplices, or set him up to take the fall for). Lostutter had begun questioning Picazio’s role in the Cummings case, at which point the same *#setg* members who hounded Plaintiff on Twitter on Steinbaugh’s behalf attacked Lostutter in a similar manner. The (admittedly mild, but persistent) preponderance of the evidence acquired by Plaintiff indicates that the Picazios were behind the disappearance of Cummings, or alternatively that they used fraud to profit from it, and White was involved in ensuring Lostutter would “go down” for the crime. Additionally, a tweet by Michelle L. McKee, after a falling-out with *#setg*, threatened to “take down” Picazio by her “flipping” sides. “Grock” has since claimed to have registered a fictitious business name of “John Grockowski,” an “internet ghost” with no other online footprint.

¹⁴ In reality, this essay, entitled *Ray Gordon vs. The Magnificent Seven*, was posted by an imposter, either or both of Jeffrey Kalligheri, now head of Lions Gate Entertainment, and David Clanton, both of Massachusetts, in exchange for insider access to elite gymnasts at their meets and tour stops. The graphic essay was signed in Plaintiff’s name by these individuals, and originated from an ISP which Plaintiff has never used. Mr. Clanton had also impersonated Plaintiff’s late mother on a sex newsgroup with a fake advertisement soliciting sex from men, and listing Plaintiff’s address and phone number. Four men called in response.

d. The "Family" section references a 2007 incident where a threatening letter (the full text of which is attached hereto as Exhibit E and incorporated by reference as if stated verbatim herein) was mailed (offline) to Plaintiff's dying mother, repeating the pedophilic essay written by Clanton/Kalligheri to which the site linked. Derek Trunk, who is now serving seventy-five months in federal prison for child porn trafficking, posted to USENET shortly after and referenced the contents of this letter, which Plaintiff had not made public. Plaintiff avers, based on preponderance of the evidence, that Trunk authored the letter, which begins and is excerpted as follows:¹⁵

Dear Ms. Parker

I am writing you about your son, Gordon Roy Parker, and his activities on the Internet and in various courts in Pennsylvania and Delaware. Gordon first came to my attention in October of 1996, when he would have been 28 years old. At this point in time, Gordon was posting mostly in groups related to hypnosis under the nic 'WhizardRay' and calling himself Ray Gordon. Allow me to quote from the Usenet article that brought your son to my attention, originally posted by a third party:

Excerpt of pedophilic essay written by Clanton/Kalligheri/imposter:

During the following three years, Gordon would routinely try to pass himself off as a gymnastics coach. This was made even more disturbing when it was discovered that Gordon was writing rape stories starring several underaged female gymnasts. Allow me to quote a few paragraphs of his story "Ray Gordon vs. The Magnificent Seven":

"Now do you understand, cunt?" Ray asked Shannon, the teen's gaze riveted to the transformation of little Dominique. The little teen was being raped to death, and she was urging her black rapists to even greater heights of depravity. A tear came to Shannon's eyes, and she nodded her head. Yes, she did understand. This was hell, and these men were soulless demons. "Let's check out Razorman," Ray dragged Shannon by the hair over to where the knifemaster and his squad were flaying Amanda Borden and Jaycie Phelps alive.

Close at Razorman's heels was Cannibal, who lived up to his name. Amanda was in worse shape than Jaycie, and it was obvious the chunky, muscular teen had been attempting to fight off Razorman and his men. She was now being held down as the Razor skillfully carved graffiti over her muscular body with a laser-sharp pen knife.

¹⁵ It appears that Trunk was a primary author of the ED page, and after his arrest and incarceration, the ED editors, including Zaiger, took over updating the page.

e. The “Ray’s Self-Proclaimed Careers” section suggests Plaintiff uses chess “as an excuse to meet teenaged boys,” and claims he needs a certification to be a paralegal, which is not the case in Pennsylvania. It also mocks his being on disability.¹⁶

45. At the time of publication, Defendants either knew, or should have known, that

a) the statement in paragraph 39 was false; Plaintiff has never committed Social Security fraud, and

b) that the statements cited in paragraph 44 from the ED page (Exhibit C), especially the one about the rape-murder essay, were false.

46. The statements referenced hereinabove:

a. Have been read by numerous third parties, many of whom believed them to be accurate, and some of whom have acted out, even illegally, based on their content.

b. Were not privileged.

c. Were not made by third parties, but by Defendants themselves, under the direction of Defendant Zaiger.¹⁷

d. Are not time-barred, due to fraud (claiming to be overseas), evasion of service of process (by hiding the servers), and coercion (the e-mail threats set forth in paragraph 13) e.

e. Were not made with Plaintiff’s consent.

¹⁶ This section also contains the statement “Activist against child abuse and sexual harassment. Claims that gymnastics coaches are child abusers.” In the past year alone, revelations of sexual abuse dating back to the 1990s, involving the “Gymnastics Mafia” that published the first “hate site” about Plaintiff, continue to make news.

¹⁷ Even if originally made by third parties, Defendants made the words their own when they reposted them to the new servers at the .se and .rs domains.

47. As a direct and proximate result of Defendants' conduct, as set forth hereinabove, Plaintiff has suffered loss of income, loss of housing stability, loss of accumulated wealth, loss of enjoyment of life, ostracization to the point of having to live as a recluse, severe emotional distress (including suicidal thoughts), and has lived in genuine fear for his safety for almost five years running. This will not end until Defendants' conduct is rightfully enjoined by this Court.

48. Plaintiff is entitled to relief for the Pennsylvania tort of libel, and states his claim for relief on this basis.

49. Plaintiff is entitled to compensatory damages, punitive damages (due to the intentional, wanton, willful nature of the conduct), costs of suit, including reasonable attorney fees (if applicable, though this is not likely), injunctive relief sufficient to terminate the actionable conduct, and other relief deemed necessary and proper to make Plaintiff whole.

COUNT TWO: INVASION OF PRIVACY (All Defendants)

50. Plaintiff realleges, as if verbatim, all averments from all previous paragraphs.

51. Taken as a whole, and beyond any specific lie, the ED page portrays Plaintiff in a completely false light, for the same reasons set forth in Count One above.

52. For Defendants' conduct, as forth hereinabove, Plaintiff is entitled to relief under the Pennsylvania tort of invasion of privacy, and states his claim for relief on this basis.

53. As a direct and proximate result of Defendants' wanton, willful, and malicious conduct, Plaintiff has suffered similar or identical harm to that set forth in Count One above.

54. Plaintiff is entitled to compensatory damages, punitive damages (due to the intentional, wanton, willful nature of the conduct), costs of suit, including reasonable attorney fees (if applicable, though this is not likely), injunctive relief sufficient to terminate the actionable conduct, and such other relief deemed necessary and proper to make Plaintiff whole.

COUNT THREE: TORTIOUS INTERFERENCE (All Defendants)

55. Plaintiff realleges, as if verbatim, all averments from all previous paragraphs.

56. The ED page itself, and more specifically, the direct contact with Plaintiff's neighbors, plus the site's incitement to others to do the same, was the direct, proximate cause of increased harassment directed at Plaintiff by those who work for the Fairfax, as outlined in greater detail in Parker v. 4247FX, Inc.

57. Defendants were well aware of Plaintiff's lease, which is a contract under Pennsylvania law, and their conduct was specifically intended to interfere with that contract, in a manner which is, well, *tortious*, predicated on the underlying tort of defamation.¹⁸

58. As a direct and proximate result of Defendants' wanton, willful conduct, Plaintiff has suffered the "poisoning" of his rental contract, permanently damaged if not about to end, and have made it impossible for Plaintiff to experience the quiet enjoyment of his demised premises.

59. The damage suffered by Plaintiff as a result of Defendants' wanton, willful conduct is similar or identical to that caused by the conduct in Count One.

60. Plaintiff is entitled to relief under the Pennsylvania tort of tortious interference, and states this claim for relief on this basis.

61. Plaintiff is entitled to compensatory damages, punitive damages (due to the intentional, wanton, willful nature of the conduct), costs of suit, including reasonable attorney fees (if applicable, though this is not likely), injunctive relief sufficient to terminate the actionable conduct, and such other relief deemed necessary and proper to make Plaintiff whole.

COUNT FOUR: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

62. Plaintiff realleges, as if verbatim, all averments from all previous paragraphs.

¹⁸ A *tortious interference* claim in Pennsylvania must be predicated on illegal underlying conduct. For example, had the essay actually been written by Plaintiff, publicizing this would not have run afoul of this tort.

63. What Plaintiff has endured at the hands of Defendants, and their *#setg* minions, is so *unreal* and incredibly outrageous that reasonable observers often have a hard time believing anyone could be targeted to such an extreme degree.

64. As a direct and proximate result of Defendants' conduct, as set forth throughout the Complaint, Plaintiff has endured extreme emotional distress, for which he has sought counseling, and which has caused him, several times, to contemplate suicide. Even without a physical death, his "social death" has been made near-total, thanks to the use of search engines and Section 230 as high-grade weapons.

65. Plaintiff is entitled to relief under the tort of Intentional Infliction Of Emotional Distress (IIED), as recognized by the Third Circuit, acting in place of the state supreme court.

66. Plaintiff is entitled to compensatory and punitive damages, costs of suit, including reasonable attorney fees (where applicable), injunctive relief sufficient to terminate the actionable conduct, and any other relief deemed just and proper to make Plaintiff whole.

COUNT FIVE: CIVIL CONSPIRACY (ALL DEFENDANTS)

67. Plaintiff realleges, as if verbatim, all averments from all previous paragraphs.

68. Defendants' conduct, as set forth throughout the Complaint, and incorporated here by reference, constitutes numerous violations of the Pennsylvania tort of civil conspiracy, in that the ED page was designed to rely on co-conspirators to violate the underlying state-law tort of libel. Consequently, Plaintiff states this claim for relief on this basis.

69. As a direct and proximate result of the conspiracy, and separate from the damages caused by violation of the underlying torts, Plaintiff has endured the same damages to an exponential degree than he would have suffered from an individual tortfeasor.

70. Plaintiff is entitled to similar or identical relief as set forth in Count One, but to an even greater degree.

COUNT SIX: VIOLATIONS OF THE FAIR HOUSING ACT

71. Plaintiff realleges, as if verbatim, all averments from all previous paragraphs.

72. Plaintiff avers that Defendants' intent in contacting Plaintiff's neighbors (and landlord) was to interfere with his right to nondiscriminatory housing, and to noninterference by third parties who, like Defendants, were motivated by their perception of Plaintiff's mental illness, including but not limited to his bipolar disorder.

73. Plaintiff is entitled to relief under the Fair Housing Act, 42 USC §3601 *et seq.*, and states this claim on that basis.

74. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered the damages set forth in Count One, and the diminishing or eventual elimination of his right to fair housing in the form of his lease at the Fairfax, which Defendants managed, through their interference, to undermine to the point of destruction.

75. Plaintiff is entitled to the same relief as set forth in Count One, plus reasonable attorney fees (where applicable).

COUNT SEVEN: PETITION FOR CHANGE OF LEGAL NAME

76. Plaintiff realleges, as if verbatim, all averments from all previous paragraphs.

77. Plaintiff is no longer the ***Gordon Roy Parker*** who was born on January 6, 1967. That person's identity has been destroyed and usurped by Defendants.

78. Plaintiff is unable to change his name in a state-court proceeding because he has judgments against him, even though his reason for needing to change his name is to protect his constitutional rights to life, liberty, the pursuit of happiness, and equal opportunity.

79. Additional rights protected by a legal change of Plaintiff's name in this case include the property rights of individuals who would inevitably be set up to be sued by the fraudulent lies of Defendants. Because these otherwise-innocent individuals trust in others and what they read online, they are literally "sitting ducks" for being sued for what would otherwise be benign internet searching and the resulting interactions with someone they just met (Plaintiff).

80. Plaintiff is entitled, in this case, to legally change his name at any time in the future, and to file his new name under seal, as provided by Pennsylvania law in cases of stalking.

COUNT EIGHT: DECLARATORY RELIEF

81. Plaintiff realleges, as if verbatim, all averments from all previous paragraphs.

82. Plaintiff is entitled to declaratory relief in this case to protect his constitutional right to a good reputation, free of ongoing defamation which he otherwise cannot enjoin.

83. Specifically, such a declaration should find that Plaintiff never authored any essay about raping and murdering young gymnasts, and that the statements concerning him as set forth in paragraphs 39-44 and elsewhere in this Complaint are in fact not true.¹⁹

PRAYER FOR RELIEF

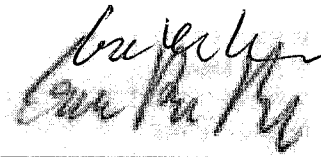
WHEREFORE, Plaintiff seeks the following relief:

1. A declaration that Defendants have libeled Plaintiff with regard to all related averments set forth in this Complaint, including but not limited authorship of the "essay."
2. Unspecified compensatory damages for each count, in an amount to be determined at trial, but which, in total or for any individual count, are not less than THREE HUNDRED MILLION DOLLARS (\$300,000,000.00 US).

¹⁹ This relief is critical in preserving Plaintiff's constitutional rights, absent an overturning of Section 230. While Plaintiff may use an alternate name in place of his legal name in many places, he cannot do so when seeking employment, housing, medical care, or in other official capacities, putting him at risk every time he attempts to secure them.

3. The maximum punitive damages allowed by law, where applicable.
4. Costs of suit, including reasonable attorney fees, where applicable.
5. A temporary (Rule 65 motion pending) and then permanent injunction enjoining Defendants from using Plaintiff's name, likeness, or using third parties or other individuals to the extent necessary to terminate the actionable conduct.
6. Such other and further relief as this Court may deem just and proper to make Plaintiff whole.

This the 13th day of June, 2017.



GORDON ROY PARKER, Pro Se
4247 Locust Street, #119
Philadelphia, PA 19104
(215) 921-4592
snodgrasspublish@aol.com
PLAINTIFF

Exhibit A

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JONATHAN MONSARRAT,

Plaintiff,

v

GOTPER6067-00001 and DOES 1-5, dba
ENCYCLOPEDIADRAMATICA.SE, and
BRIAN ZAIGER,

Defendants

CIVIL ACTION NO. 17-cv-10356-PBS

**AFFIDAVIT OF SERVICE
OF SUMMONS AND COMPLAINT**

I, Jonathan Cassidy, on oath depose and state as follows:

1. I am over the age of twenty-one and not a party to this action. I am a private investigator with Elite Detective Services, License Number LP0467C, a business address at 495 Cabot Street, Beverly MA 01915, (Tel.) 978-927-4449; (Fax.) 978-927-4119; email:

2. On Wednesday, April 26, 2017 at 10:53 A.M., I hereby certify that I served Brian Zaiger with copies of; the summons to Brian Zaiger in Civil Action 17-cv-10356-IT, verified complaint and *ex parte* motion for recusal at the Lafayette Hotel, Room 111, 116 Lafayette Street, Salem, Massachusetts.

3. I effected service as follows. The investigation determined that Brian Zaiger was staying at the Lafayette Hotel in Salem, Massachusetts. Upon entering the hotel, I determined that the Subject, Mr. Zaiger, was staying in room 111. I went to room 111, knocked on the door. The Subject, Mr. Zaiger, answered, opened the door, and in response to my question confirmed he was

indeed Brian Zaiger. Whereupon, at 8:53 A.M. on April 26, 2017, I personally delivered and handed to Brian Zaiger copies of the summons, verified complaint, and motion.

EXECUTED UNDER THE PENALTIES OF

1st DAY OF MAY, 2017

Jonathan

COMMONWEALTH OF MASSACHUSETTS

Essex, ss

On this 1st day of May, 2017, before me, the undersigned notary public, personally appeared Jonathan Cassidy who proved to me through satisfactory evidence of identification, which was his driver's license, to be the person whose name is signed on the preceding affidavit and acknowledged to me that he so signed it voluntarily under the penalties of perjury for its stated purpose.

Jane Wetson
Notary Public
My Commission Expires:

JANE M. WETSON
NOTARY PUBLIC
COMMONWEALTH OF MASSACHUSETTS
My Comm. Expires May 19, 2017

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and I served paper copies to the Defendant Does 1-5 by email on May 1, 2017.

/s/ Richard A. Goren

Exhibit B
Cease And Desist Letter

CEASE AND DESIST: Remove your defamatory/misuse-of-likeness page about me immediately

From: Gordon Roy Parker <gordonroyparker@aol.com>
To: contact <contact@encyclopediadramatica.se>
Date: Thu, Jun 1, 2017 7:18 pm

Dear ED admins and owner:

I see you have reposted the "hate" page about me, this time located at:

https://encyclopediadramatica.rs/Ray_Gordon

As I've already put you on notice before concerning, the page is defamatory, portraying me in a general false light, while telling the specific lie about an essay that was authored by someone impersonating me. It also misuses my name and likeness, for which the site (and its owner and admins) can be sued.

Since the page is also endangering my physical safety (I get death threats because of it), there is already extensive police involvement, and this correspondence will be copied to law enforcement as part of that investigation. I will be filing a private criminal complaint now that the owner of the site has been identified and it has been established that the site is based in the United States.

Please give your immediate attention to this matter.

Sincerely,

Gordon Roy Parker

p.s. - your site is the only reason I'm living on "tax dollars." You are costing the government and a number of innocents who wind up sued for repeating what you write a lot of money.

Gordon Roy Parker
gordonroyparker@aol.com

Exhibit Chttps://encyclopediadramatica.rs/Ray_Gordon

Retrieved May 10, 2017



Ray Gordon

Gordon Roy Parker, who likes to pretend his name is Ray Gordon, is a 50 something year old semi well known Usenet kook, troll and YouTube user that lives off of your hard earned tax dollars in West Philadelphia. He is known through hundreds of usernames online, and seems to have an issue sticking with one identity. Many of his older Twitter accounts are suspended due to hate speech against women.

Contents

- 1 On USENET
- 2 On YouTube
- 3 On Yahoo Groups
- 4 On Twitter
- 5 E-lawyer
- 6 On Encyclopaedia Dramatica
- 7 Family
- 8 Ray's self-proclaimed careers
- 9 Other Links

On USENET

One of Gordon's first notable acts was when he harassed a woman named Tabitha Hassell into moving in order to get away from him. Gordon has also been known to try to solicit underage gymnasts to convince them to let him coach them. He also posts fanatic that revolves around himself torturing, raping and killing young gymnasts. All seduction fast became his favorite group soon after he discovered it, and his life revolved around it ever since.

Right after the Jews did 9/11, Gordon quickly proclaimed that there was no significant loss of life in those towers. Gordon quickly took steps to remove the posts from the Google Groups archive, but the posts were saved thanks to several people reposting them all over the usenets.

On YouTube

In 2010, as part of his attempt to transform himself into the next Chris Chan, Gordon got himself a state-of-the-art-in-1997 video camera and uploaded some videos to his YouTube account. Prior to this, however, he hired a woman named Princess Jodie to make several videos for him to post on his account that totaled less than one minute combined. The whereabouts of these videos at present are unknown, but many believe that Gordon's taping to them while sobbing at his permavirgin status.

As of late, Gordon seems to limit his time on YouTube to posting comments where he bitches about women not fucking him, complains about commercials on YouTube, whines about various MRA positions, and various comments about his "slones", such as General Hospital.

UPDATE: On September 18th, 2016, The genius of the internet, the guru of getting laid despite being a herpes-riddled virgin, the master chess player and horse beller, posted his most popular video yet. At over 88,000 views, he admits that he lives off of \$867 a month in SSI and what he gets from food stamps.

On Yahoo Groups

Gordon first discovered the internet outside of usenet in 2002 when he created the Yahoo group The Seduction Library. The group has been abandoned since 2003.

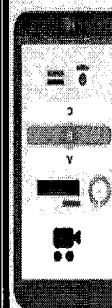
In 2007, Gordon tried creating another Yahoo group called Project 5,000, with the stated goal of attaining 5,000 members so that he could collect \$10 from each of them. The current membership count of 78 is slightly less than the stated goal.

Your score summary:

0
0%

0
0%

← Single player mode



%0
0

➔ Single player mode

On Yahoo Groups

Gordon first discovered the internet outside of usenet in 2002 when he created the Yahoo group The Seduction Library. The group has been abandoned since 2003. In 2007, Gordon filed creating another Yahoo group called Project 5,000, with the stated goal of attaining 5,000 members so that he could collect \$10 from each of them. The current membership count of 78 is slightly less than the stated goal.

On Twitter

Not content with being exposed as an incompetent, bumbling fool on Usenet, Youilbe and Vahoo Groups, Gordon signed up for a Twitter account to demonstrate his ability to make a complete ass out of himself in less than 140 characters. At least seven of his socks (under the names loomsmartfool, HorseOfWall, BellarOfWall, ChickidOfJingle, OriginalRayPVA, ChickidOfGhass, Ray_Gordon and GordonOfRaybaker) have been suspended for harassing women. His most recent account was suspended in early January of 2017, leading to a video rant on YouTube where he complains about it while sitting in front of some dirty fans.

E-lawyer

Gordon finances himself a lawyer, as evidenced by the multiple lawsuits he has filed (and lost) over the years. One of the most notable ones was where he tried to sue Google for \$10,000,000,000 (THAT'S TEN-FUCKING BILLION FUCKING DOLLARS). Shockingly, he didn't win his \$10,000,000,000 jackpot.

Not to be discouraged, Gordon then filed suit against Microsoft and Yahoo for a mere \$150,000.

Other victims¹¹ of Gordon include the University of Pennsylvania and several thousand people named John Doe. He constantly threatens people who mock him on social media with lawsuits.

On Encyclopedia Dramatica

On December 22nd, 2011, Gordon Roy Parker discovered that someone had written an article about him and posted it to Encyclopedia Dramatica. In a stroke of genius, Gordon came up with the brilliant idea of creating an Encyclopedia Dramatica account and deleting all the content within the article. One can only speculate as to how much Gordon cried when his brilliant plan failed.

On August 31st, 2012, having learned nothing from this previous attempt to take down ED, Gordon sent a DMCA takedown request to Google in an attempt to get this page taken off of their search page. The fact that you are currently reading this page should tell you how successful that attempt was.

Family

Gordon was also alleged to have a brother named Walter, however nobody has been able to verify this, beyond a few posts by someone claiming to be Walter in 2001 & 2002.

Gordon is also alleged to have a brother named Walter, however nobody has been able to verify this, beyond a few posts by someone claiming to be Walter in 2001 & 2002.

Ray's self-proclaimed careers

At various times in the past, Gordon has claimed to be:

- Gymnastics coach - Claims to train several gymnasts online. Most likely a ploy to get close to teenage girls.
- Pro chess player and/or chess coach - Only a bit shy of becoming World Champion. Also claims to be internationally ranked. Note: the USCF has NO listing of him on their website. According to information we have, Ray's old rating

- | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <ul style="list-style-type: none"> Pro chess player and/or chess coach - Only a bit shy of becoming World Champion. Also claims to be internationally ranked. Note: the USCF has NO listing of him on their website. According to information we have, Ray's old rating exists, but his membership is not current. Most likely a ploy to get close to teenage boys. Pro gymnastics coach - Claims to train several gymnasts online. Most likely a ploy to get close to teenage girls. Pro chess player and/or chess coach - Only a bit shy of becoming World Champion. Also claims to be internationally ranked. Note: the USCF has NO listing of him on their website. According to information we have, Ray's old rating exists, but his membership is not current. Most likely a ploy to get close to teenage boys. Pro handicapper and oddsmaker - According to his web site Pro finance market analyzer - According to his web site Pro relationships adviser - Teaches men "how to not fail" | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|

Ray Gordon is also alleged to have a brother named Waller, however nobody has been able to verify this, beyond a few posts by someone claiming to be Waller in 2001 & 2002.

Ray's self-proclaimed careers

At various times in the past, Gordon has claimed to be:

- Pro gymnastics coach - Claims to train several gymnasts online. Most likely a ploy to get close to teenage girls
- Pro chess player and/or chess coach - Only a bit shy of becoming World Champion. Also claims to be internationally ranked. Note: the USCF has NO listing of him on their website. According exists, but his membership is not current. Most likely a ploy to get close to teenage boys.
- Pro handicapper and oddsmaker - According to his web site.
- Pro finance market analyzer - According to his web site.
- Pro relationships adviser - Teaches men "how to get laid"
- Pro hypnotist and hypnosis instructor - Harasses and bad mouths female hypnotists.
- Writer - Writes a book about seduction, horse racing and Dominique Moceanu.
- Best secretary in the USA - But got fired because he wasn't an "office whore"
- Paralegal - Pennsylvania requires some sort of professional certification, but Ray doesn't know that
- Activist against child abuse and sexual harassment - Claims that gymnastics coaches are child abusers, yet still claims to be one (see above).
- Professional psychic - And still doesn't have a clue about the Editorial Staff of RayF.A.Q.
- Civil Rights Activist - Claims that hiring discrimination has prevented him from being employed. Filed suit against UPenn. Hmmm...
- Journalist - Not accredited by any news agency, though.
- Software Company CEO & entrepreneur - Own company, of course.
- Successful business owner - Also known as broke, and filed bankruptcy in 1997 cna claims to be on disability for "mental anguish" as of 2015.
- Internet guru - He can't read headers on Usenet posts, but he's learning
- Sports historian - Hmmm...
- Body builder - And of course extremely good looking, which is why he hasn't posted a picture of himself that isn't more than 30 years old.
- Jesus Christ - Only in past life though.
- Skilled Hypnotist - Claims to be able to "Gain TOTAL Sexual Control" over women
- Welfare recipient - Getting that \$867 every month plus food stamps makes women positively moist!

Other Links

The OFFICIAL SITE of Ray Gordon!! - Where he tries to sell you several e-books.

- Gordon's Youtube account
- Gordon's Google+ account
- A somewhat disorganized page detailing some of Gordon's activities, including 121(!) of Gordon's socks deleted
- Message board post that contains a partial list of usernames that Gordon has used since 1996
- News story about Gordon losing his ten billion dollar lawsuit against Google
- Link to the dismissal of Gordon's suit against Google
- Google deciding not to help Gordon Roy Parker cover up his past (and ongoing) incompetence.

Ray Gordon is part of a series on Usenet.



Big Brother is watching!
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Ray Gordon - Encyclopedia - x

Google

Exhibit D
E-mails from Encyclopedi Dramatica (Zaiger)

Mail #1:

Re: Please delete the infringing hate page about me on your site (thanks!)
From: Encyclopedi Dramatica <contact@encyclopediadrarnatica.ch>
To: BettorOffSingle <BettorOffSingle@aol.com>
Date: Fri, Dec 23, 2011 4:14 am

Actually, it doesn't need to respond to any international suit. Infact, our owner can't even enter the US because he would be detained upon arrival.

A transit provider can only dampen a prefix, and since the smallest possible BGP announce is like a /22, the only way to filter us would be to block entire ranges. That's assuming US peers decide to lose millions in equal peer policy due to one site. You wont see any backbone providers attempt to filter a /32 on their routers, because if you do it with one site, then you can do it with all sites which would eat up valuable memory on already overloaded BGP equipment. It just wont happen, it never has happened, and you're a moron.

SOPA would only be effective if our domain was blocked by authoritative nameservers, and no US nameservers handle .ch RIR requests.

You are also forgetting that our public facing servers are all \$10 cloud servers that reverse proxy to our real, hidden infrastructure, which you have no idea of the location. Any action against a load balancer would be resolved in under 30 seconds with the copy of one configuration file.

Please sue us, we are really sick of people telling us they will and then no fun happening.

Mail #2:

Re: Please delete the infringing hate page about me on your site (thanks!)
From: Encyclopedi Dramatica <contact@encyclopediadrarnatica.ch>
To: BettorOffSingle <BettorOffSingle@aol.com>
Date: Fri, Dec 23, 2011 4:52 am

Portlane aka Gridlane aka Gridlane.com is the provider of our cheap as fuck cloud load balancers which reverse proxy to hidden infrastructure. It is easy to find that out as you can just ask Cloudflare.

Cloudflare -> Public load balancers -> application servers.

Adding "Anonymous should have warned you about messing with me." to your already hilarious article. Not even sure if you're aware of ED's connection to LulzSec, and the fact that ED.ch is a product of #opSaveED from Anonymous.

Mail #3:

Re: Please delete the infringing hate page about me on your site (thanks!)
From: Encyclopedia Dramatica <contact@encyclopediadramatica.ch>
To: BettorOffSingle <BettorOffSingle@aol.com>
Date: Fri, Dec 23, 2011 5:07 am

How is Locust Street? By the way, that IP is yours. It's all being added to your article. Keep talking into the microphone.

Mail #4:

Re: Please delete the infringing hate page about me on your site (thanks!)
From: Encyclopedia Dramatica <contact@encyclopediadramatica.ch>
To: BettorOffSingle <BettorOffSingle@aol.com>
Date: Fri, Dec 23, 2011 5:11 am

I think we will post some of your fanfic to your neighbors. A few hundred copies per house should be fine. It's also against the law to write stories involving underage girls. Welcome to the sex offenders registry.

Exhibit E
2007 Letter to Penny

Dear Ms. Parker

I am writing you about your son, Gordon Roy Parker, and his activities on the Internet and in various courts in Pennsylvania and Delaware. Gordon first came to my attention in October of 1996, when he would have been 28 years old. At this point in time, Gordon was posting mostly in groups related to hypnosis under the nic 'WhizardRay' and calling himself Ray Gordon. Allow me to quote from the Usenet article that brought your son to my attention, originally posted by a third party:

" As she explained to me, her contact with "WhizardRay" was an hour-long phone conversation six months ago. As she described it, she spent the last 30 minutes trying to diplomatically disengage herself from a person whose needs were far beyond her ability to address. (Tabitha is a graduate of Don Mottin's fine school, but by her own evaluation she hardly has the depth of expertise ascribed to her by WhizardRay.) Tabitha assured me that she never hypnotized Gordon, that the extent of contact had been the one short conversation and a letter that tried to sever contact gracefully. Tabitha was not prepared for what came next when she made it clear she did not want to continue contact

Endless phone calls both to her home and her office, faxes, e-mail, harrassment whenever she logged onto AOL, e-mail from strangers, and, she says, threats against her son, threats to have people "visit her."

Tabitha moved and changed her phone number. WhizardRay got the new address and number and continued the harrassment. She endured and hoped he would go away. He hasn't.

Taking a few hours to investigate I found the following:

His full AOL profile has already been posted in this discussion group. It strongly suggests he does not like women, blaming them for his problems, his failures. His name is not Ray Gordon.

His real name is Gordon Roy Parker. He lives with his mother and brother in a converted hotel called the Fairfax Apartments at 4247 Locust Street, Apt 806, Philadelphia PA 19104. Gordon's phone number is 215-386-7366."

Around this time, Gordon was trying to pass himself off as the CEO of a software company. His alleged business was "Ray Gordon Software, Inc". At the time there was evidence that either you or your son was running a word processing business out of your apartment, and there is still some confusion who is in control of Penn Word Processing. There is little doubt that Gordon is the primary force behind Snodgrass Publishing.

Around May of 1998, Gordon discovered the newsgroup alt.seduction.fast, a group that would occupy him for eight years and counting. The first posts I have been able to find on this group are under the nic 'seducer9917'. Most of his posts to this group initially were either attacking the members, or giving advice that was just a repeat of what other posters to this group had posted earlier. Gordon also posted regularly to newsgroups related to horse racing, chess, gymnastics and romance around this time. Although I am

not personally familiar with these topics, I have been assured by those that were that Gordon's tactics in these groups were similar in nature. This continued for several years.

During the following three years, Gordon would routinely try to pass himself off as a gymnastics coach. This was made even more disturbing when it was discovered that Gordon was writing rape stories starring several underaged female gymnasts. Allow me to quote a few paragraphs of his story "Ray Gordon vs. The Magnificent Seven":

"Now do you understand, cunt?" Ray asked Shannon, the teen's gaze riveted to the transformation of little Dominique. The little teen was being raped to death, and she was urging her black rapists to even greater heights of depravity. A tear came to Shannon's eyes, and she nodded her head. Yes, she did understand. This was hell, and these men were soulless demons. "Let's check out Razorman," Ray dragged Shannon by the hair over to where the knifemaster and his squad were flaying Amanda Borden and Jaycie Phelps alive.

Close at Razorman's heels was Cannibal, who lived up to his name. Amanda was in worse shape than Jaycie, and it was obvious the chunky, muscular teen had been attempting to fight off Razorman and his men. She was now being held down as the Razor skillfully carved graffiti over her muscular body with a laser-sharp pen knife.

CUNT! SLAVE! WHORE! PAIN-TOY! DOG! PIG! The blood-carved words assaulted the eyes like the carnage from an airplane crash. Amanda was sobbing hysterically, the pain overwhelmed by the very thought that she was being skinned alive.

After this was revealed, your son stopped trying to solicit gymnasts to coach, but he does still regularly post to the gymnastics newsgroups.

Gordon also has threatened to harm the daughter of a woman whom he was having a disagreement with around this time. Gordon also wished death on another woman who was suffering from cancer. Gordon even threatened to "wipe that grin off your face with a baseball bat". Everybody thought that your son had sunk as low as anybody could sink when he tried to attribute the "bat" comment to you. Little did we know that we were to be proven very, very wrong.

On September 11th, 2001, there were 4 terrorist attacks committed against the United States, killing over 3,000 people. These attacks shocked and horrified most people the world over. So, you can imagine the disgust that overcame regulars of the same newsgroups that your son posts to when he posted these choice quotes in the following hours:

"There was no significant loss of life in those towers. Not a one."

- Gordon Roy Parker (aka Ray Gordon), September 11, 2001

"This attack happened in my HOMETOWN, a hometown I do not live in or work in because of illegal behavior. I hope those who swiped my ability to live there enjoy the message they got from GOD today....."

- Gordon Roy Parker (aka Ray Gordon), September 11, 2001

"In that building existed little more than a bunch of companies which hire "office whores" and the like. I have no sympathy for employment discriminators, and if someone had to die in this attack, I couldn't think of a better group of people for the terrorists to pick."

- Gordon Roy Parker (aka Ray Gordon), September 11, 2001

"Now you know what it's like to see your horrors mocked the way mine have been. That's not mental illness, that's a political message, apparently delivered quite brilliantly."

- Gordon Roy Parker (aka Ray Gordon), September 11, 2001

"There was no significant loss of life in those towers. Their own evil is what prevented me from being among the dead, and which added the "Unknown Office Whore" to their numbers because god forbid some loser executive would have to hire a man. Those corporations could have hired me, put me to work in that building, let me live in NYC, and experience all of the fun that's going on up there now."

- Gordon Roy Parker (aka Ray Gordon), September 11, 2001

It was around this time that your son started filing numerous meritless lawsuits against several people and entities. The list of defendants in your sons lawsuits include, but are not limited to, The University of Pennsylvania, Ross Jeffries of California, Learn The Skills, and Thom Geiger of Mississippi. Most of these lawsuits have been dismissed because of filing errors made by your son. For example, the reverse gender discrimination lawsuit against UPenn was dismissed because Gordon never applied for a specific job, and the case against Learn The Skills was dismissed for lack of jurisdiction.

The most noteworthy lawsuit that Gordon filed was a copyright infringement case that he brought against Google claiming damages in excess of ten billion dollars. This case was dismissed last year for failure to state a claim. Right now, Google is trying to claim eleven thousand dollars in damages against your son. While Google attempts to win that claim against your son, Gordon is busy trying to prosecute another lawsuit against Learn The Skills, Ross Jeffries and Thom Geiger. This case is being prosecuted in Delaware. In the Delaware case, Gordon's pleadings consist of movie quotes and blatantly inaccurate information. As you can imagine, Gordon's case isn't going well. It is only a matter of

time before Gordon is called to task over his recent behaviour in the judicial system. You may want to examine what kind of liability you would encounter should Google's motion for damages be approved, considering that you are his primary method of support.

One thing is clear: Over the past decade, your son's condition has deteriorated. If you're still his primary means of support, you should consider what would become of him after you pass on. You should also consider whether or not your son is in need of psychiatric help, before the decision is made for you, most likely by law enforcement, as there is a possibility that your son will stop fantasizing about violence and actually try some of the things he writes about.